

EXHIBIT “A”

IN THE STATE COURT OF BIBB COUNTY

STATE OF GEORGIA

SANDY COLSTON,

Plaintiff,

vs.

DOLLAR TREE STORES, INC., And
JOHN DOE, INC.,

Defendants.

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CIVIL ACTION NO.: _____

COMPLAINT FOR DAMAGES

COMES NOW, Plaintiff Sandy Colston and brings this *Complaint* against Defendants Dollar Tree Stores, Inc. and John Doe, Inc. and respectfully shows this Court as follows:

1.

Defendant Dollar Tree Stores, Inc. is a foreign profit corporation whose principal office address is 500 Volvo Parkway, Chesapeake, Virginia, 23320. They may be served through their registered agent, Corporation Service Company, 2 Sun Court, Suite 400, Peachtree Corners, Gwinnett County, Georgia, 30092. This incident occurred at 1572 Eisenhower Parkway, Macon, Bibb County, Georgia 31206, therefore, Defendant is subject to the jurisdiction of this Court and venue is proper in Bibb County.

2.

Defendant John Doe, Inc. is an unknown entity and is subject to the jurisdiction of this Court and venue is proper.

3.

Venue is proper in this Court.

4.

On or about, February 13, 2020, Plaintiff was a patron at the Dollar Tree located at 1572 Eisenhower Parkway in Macon, Georgia when she slipped and fell on a soapy substance on the floor.

5.

The Defendant knew or should have known that the entrance to the store was unsafe due to hazardous conditions and that the Plaintiff could not have seen this using reasonable diligence.

6.

The Defendant had superior knowledge or should have known of the dangerous condition caused by the unsafe conditions of the entrance and failed to warn the Plaintiff of said dangerous condition.

7.

The Plaintiff was lawfully on the premises for the business purpose of purchasing items as a consumer.

8.

As a result of the incident complained of herein, plaintiff sustained severe injuries and great pain of body and mind from which she did then suffer, now suffers, and may continue to suffer. Plaintiff shows further that she has incurred expenses in the nature of medical bills and may have incurred damages in the form of diminution of earning capacity from the date of the accident until filing of this Complaint and continuing hereafter until Plaintiff fully recovers from the injuries resulting from the incident.

9.

Plaintiff shows that all of her injuries and damages were a direct result of and proximately caused by the acts of the Defendants named above.

WHEREFORE, Plaintiff demands:

- (a) That summons be issued requiring the Defendants to be served as provided by law and requiring the Defendants to answer the Complaint;
- (b) That Plaintiff have a trial by a fair and impartial jury of twelve members;
- (c) That Plaintiff obtain a judgment for damages against the Defendants in a sufficient amount to compensate her for her injuries and damages;
- (d) That all costs of this action be assessed against the Defendants; and
- (e) That Plaintiff has such other and further relief as this Court may deem just and equitable.

Respectfully submitted this 17th day of December, 2021

/s/ Reza Sedghi
REZA SEDGHI
State Bar No. 634077

/s/ Sandra Davis
SANDRA DAVIS
State Bar No. 334795
Attorneys for Plaintiff

2870 Vineville Ave
Macon, Georgia 31204
Phone: (478) 741-3770
Facsimile: (478) 741-3771
sedghilaw@gmail.com

SHERIFF'S INSTRUCTIONS:

PLEASE SERVE THE DEFENDANT AT THE FOLLOWING ADDRESS:

Corporation Service Company
As Registered Agent of
Dollar Tree Stores, Inc.
2 Sun Court, Suite 400
Peachtree Corners, Georgia 30092
Gwinnett County

General Civil and Domestic Relations Case Filing Information Form

☐ Superior or ☒ State Court of Bibb County

21-SCCV-093699

JBH

DEC 17, 2021 12:19 PM

For Clerk Use Only

Date Filed 12-17-2021

MM-DD-YYYY

Case Number 21-SCCV-093699

Patricia M. Graves
Patricia M. Graves, Clerk of State Court
Bibb County, Georgia

Plaintiff(s)

COLSTON, SANDY

Last	First	Middle I.	Suffix	Prefix

Last	First	Middle I.	Suffix	Prefix

Last	First	Middle I.	Suffix	Prefix

Last	First	Middle I.	Suffix	Prefix

Plaintiff's Attorney Sedghi, Reza

Defendant(s)

DOLLAR TREE STORES, INC.

Last	First	Middle I.	Suffix	Prefix

JOHN DOE, INC.

Last	First	Middle I.	Suffix	Prefix

Last	First	Middle I.	Suffix	Prefix

Last	First	Middle I.	Suffix	Prefix

Bar Number 634077Self-Represented ☐

Check one case type and, if applicable, one sub-type in one box.

General Civil Cases

- ☐ Automobile Tort
☐ Civil Appeal
☐ Contract
☐ Contempt/Modification/Other Post-Judgment
☐ Garnishment
☒ General Tort
☐ Habeas Corpus
☐ Injunction/Mandamus/Other Writ
☐ Landlord/Tenant
☐ Medical Malpractice Tort
☐ Product Liability Tort
☐ Real Property
☐ Restraining Petition
☐ Other General Civil

Domestic Relations Cases

- ☐ Adoption
☐ Contempt
☐ Non-payment of child support, medical support, or alimony
☐ Dissolution/Divorce/Separate Maintenance/Alimony
☐ Family Violence Petition
☐ Modification
☐ Custody/Parenting Time/Visitation
☐ Paternity/Legitimation
☐ Support – IV-D
☐ Support – Private (non-IV-D)
☐ Other Domestic Relations

- ☐ Check if the action is related to another action(s) pending or previously pending in this court involving some or all of the same parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number

Case Number

- ☒ I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in O.C.G.A. § 9-11-7.1.

- ☐ Is a foreign language or sign-language interpreter needed in this case? If so, provide the language(s) required.

Language(s) Required

- ☐ Do you or your client need any disability accommodations? If so, please describe the accommodation request.

**STATE COURT OF BIBB COUNTY
STATE OF GEORGIA**

CIVIL ACTION NUMBER 21-SCCV-093699
COLSTON, SANDY

PLAINTIFF

VS.

DOLLAR TREE STORES, INC.
JOHN DOE, INC.

DEFENDANTS

SUMMONS

TO: DOLLAR TREE STORES, INC.

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**Reza Sedghi
Reza Sedghi, Esq.
2870 Vineville Avenue
Macon, Georgia 31204**

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 17th day of December, 2021.

Clerk of State Court



Patricia M. Graves, Clerk of State Court
Bibb County, Georgia